

**CAITLIN ROBIN  
& ASSOCIATES**

50 Broad Street, Suite 702 New York, NY 10004 Tel. 646-524-6026 Fax. 929-210-7549  
737 Main Street, Suite 201, Buffalo, NY 14203 Tel. 716-771-3082  
robinandassociates.com

Misrak B. Clark  
Frank A. DiScipio  
Korman Kim  
Oleksandr Kryvenko  
Mark Laughlin  
David Lim  
Justin M. Loveland  
Caitlin Robin  
Emma J. Wiegand  
Rebecca C. Gioia, Of Counsel

December 15, 2022

**FILED VIA ECF**

Hon. John Cronan, U.S. District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: Clarke v. Security King International et al.  
Index No. 1:22-cv-05082-JPC

Dear Judge Cronan,

Our office has been retained by Defendant Security King International, LLC, in the above-captioned matter. Pursuant to Your Honor's Individual Rules & Practices in Civil Cases, we write to respectfully request (1) a 30-day extension of time for Security King International, LLC, to file a pre-answer motion to dismiss, and (2) an adjournment of the December 15, 2022 hearing on Plaintiff's pending Motion for default judgment.

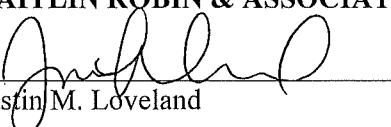
An answer to the Complaint was due on or before August 8, 2022. This is the second request for an adjournment and extension of time, the first having been granted.

Plaintiff consents to the relief sought herein to the extent that Defendant seeks an adjournment of the December 15, 2022 hearing on Plaintiff's pending Motion for default judgment.

We thank the Court for its attention to this matter.

Respectfully submitted,

**CAITLIN ROBIN & ASSOCIATES, PLLC**

By:   
Justin M. Loveland

30 Broad Street, Suite 702  
New York, New York 10004  
(646) 524-6026  
[caitlin@robinandassociates.com](mailto:caitlin@robinandassociates.com)  
*Attorneys for Plaintiffs*

cc: All parties (by ECF)

The request is granted. Defendant shall answer or otherwise respond to the Complaint by January 16, 2023. The default judgment hearing scheduled for December 15, 2022 is adjourned *sine die*.

The Clerk of Court is respectfully directed to close the motion pending at Docket Number 23.

SO ORDERED.

Date: December 15, 2022  
New York, New York



JOHN P. CRONAN  
United States District Judge